

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

RAPHAEL CLAVELL

Civil Action No.

Plaintiff,

2:10-cv-03593-SD

vs.

MIDLAND FUNDING, LLC

Defendant.

**STIPULATION TO EXTEND TIME TO RESPOND TO PLAINTIFF'S MOTION
TO COMPEL DISCOVERY DIRECTED TO DEFENDANT**

1. On December 14, 2010, Robert P. Cocco, Esquire and Scott A. George, Esquire, counsel for Plaintiff, Raphael Clavell, served upon Andrew M. Schwartz, Esquire, counsel for Defendant, Midland Funding, LLC, Interrogatories and Requests for Production of Documents addressed to Defendant, Midland Funding, LLC.

2. On December 30, 2010, counsel for Plaintiff served an additional set of Interrogatories upon counsel for Defendant.

3. On January 25, 2011, counsel for Defendant submitted correspondence to the Court seeking permission to negotiate with Counsel for Plaintiff an extension of time to respond to Plaintiff's discovery requests due to the fact that counsel for Defendant had been ill and had been unable to provide responses to Plaintiff's discovery requests.

4. Thereafter, on January 28, 2011, counsel for Plaintiff filed a Motion to Compel Discovery Directed to Defendant, Midland Funding LLC after

Defendant was unable to provide commitment or dates certain for the service or written responses and production of documents.

5. Counsel for each party has now agreed and stipulated that Midland Funding may have until Friday, February 11, 2011 to respond to Plaintiff's Motion to Compel Discovery as it continues to respond to Plaintiff's discovery requests up until that date whereby counsel for Plaintiff may withdraw the pending Motion to Compel.

6. Counsel for each party now submits this stipulation for the Court's consideration allowing counsel for Defendant, Midland Funding LLC, an extension through Friday, February 11, 2011 to respond to Plaintiff, Raphael Clavell's, Motion to Compel, unless the Motion to Compel is withdrawn by counsel for Plaintiff in the interim.

SEEGER WEISS

**MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN, P.C.**

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APPROVED BY THE COURT:

J.